

1 HEATHER E. WILLIAMS, CA Bar #122664
Federal Defender
2 REED GRANTHAM, CA Bar #294171
Assistant Federal Defender
3 Office of the Federal Defender
2300 Tulare Street, Suite 330
4 Fresno, CA 93721-2226
Telephone: (559) 487-5561
5 Fax: (559) 487-5950

6 Attorneys for Defendant
SALVADOR ORTIZ-PADILLA
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 SALVADOR ORTIZ-PADILLA,

15 Defendant.
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Case No. 1:21-cr-00239-JLT-SKO

STIPULATION TO CONTINUE CHANGE OF
PLEA HEARING; ORDER

17 IT IS HEREBY STIPULATED, by and between the parties through their respective
18 counsel, Assistant United States Attorney Justin Gilio, counsel for plaintiff, and Assistant
19 Federal Defender Reed Grantham, counsel for Salvador Ortiz-Padilla, that the change of plea
20 hearing currently scheduled for October 23, 2023, may be continued to November 13, 2023, at
21 10:00 a.m.

22 The parties are in the process of finalizing a plea agreement in this matter. Undersigned
23 counsel requires additional time to discuss the plea offer in detail with Mr. Ortiz-Padilla and to
24 file the necessary documents. As a result, the parties are requesting to continue the October 23,
25 2023 change of plea hearing to November 13, 2023. This will provide time for the parties to
26 finalize the plea documents prior to the change of plea hearing.

27 The requested continuance is made with the intention of conserving time and resources
28 for both the parties and the Court. The government is in agreement with this request and the

1 requested date is a mutually agreeable date for both parties. The parties stipulate that for the
2 purpose of computing time under the Speedy Trial Act, the Court should exclude time from the
3 date of this order through November 13, 2023, for defense preparation and investigation,
4 pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties agree that the ends of justice are
5 served by resetting the status conference date outweigh the best interest of the public and the
6 defendant in a speedy trial.

7
8 Respectfully submitted,

9 HEATHER E. WILLIAMS
10 Federal Defender

11 Date: October 17, 2023

/s/ Reed Grantham
12 REED GRANTHAM
Assistant Federal Defender
13 Attorney for Defendant
SALVADOR ORTIZ-PADILLA

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15 PHILLIP A. TALBERT
United States Attorney

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17 Date: October 17, 2023

/s/ Justin Gilio
18 JUSTIN GILIO
Assistant United States Attorney
19 Attorney for Plaintiff
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ORDER

The change of plea hearing currently set for October 23, 2023, is hereby continued to November 13, 2023, at 10:00 a.m.

The time through November 13, 2023, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: **October 17, 2023**


UNITED STATES DISTRICT JUDGE